

DANIEL J. BRODERICK, #89424
Federal Defender
LINDA C. HARTER, CA Bar #179741
Chief Assistant Federal Defender
Designated Counsel for Service
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorney for Defendant
MICHAEL ROBERT BOWLING

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-142-MCE
)	
Plaintiff,)	
)	
v.)	NOTICE OF MOTION AND MOTION TO
)	EXONERATE BOND; ORDER
MICHAEL ROBERT BOWLING,)	
)	Date: July 18, 2006
Defendant.)	Time: 8:30 a.m.
)	Judge: Hon. Morrison C. England
)	

TO: MCGREGOR W. SCOTT, United States Attorney, and CAMIL A. SKIPPER, Assistant United States Attorney,

PLEASE TAKE NOTICE, that on July 18, 2006 or as soon thereafter as set by the Court, the defendant, through his counsel undersigned, moves this Court to Exonerate the Bond posted in this case and return it to Mrs. Pardo. This motion is based on the Federal Rules of Criminal Procedure, the facts and arguments set forth below and any further argument that may occur at the time this motion is heard.

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FACTS

Mr. Bowling was ordered released on March 22, 2004 subject to the posting of a bond. Later that day, the Clerk of the Court received \$10,000 cash bond from Rosa Pardo. (See docket entry 9, receipt number 2056349.) Mr. Bowling subsequent pled guilty in Butte County Superior Court to a misdemeanor charge of possessing child pornography. He was sentenced on July 11, 2006 to a term of probation.

Pursuant to an agreement reached with the U.S. Attorney's Office and the Butte County District Attorney's Office, the defendant expects that the U.S. Attorney's Office will move on or before July 18, 2006 to dismiss the pending charges in this case. Once charges are dismissed, the defendant requests that the bond immediately be exonerated and that the money be returned its rightful owner, Mrs. Rosa Pardo. Mrs. Pardo has moved while this case has been pending. Her new address is 502 Pioner Rd./Weiser, Idaho 83672.

Dated: July 11, 2006

Respectfully submitted,

DANIEL J. BRODERICK
Federal Defender

/s/ Linda C. Harter

LINDA C. HARTER
Chief Assistant Federal Defender
Attorney for Defendant
MICHAEL ROBERT BOWLING

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O R D E R

Bond in this case is ordered exonerated and should be returned to Rosa Pardo at 502 Pioner Rd./Weiser, Idaho 83672.

DATE: July 17, 2006

A handwritten signature in blue ink, appearing to read "Morrison C. England, Jr.", is written over a horizontal line.

MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE